

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Queen Higgs,)	
)	Case No 07 C 6989
Plaintiff,)	
)	Judge Guzman
v.)	
)	Magistrate Judge Cox
City of Chicago, Illinois, and Chicago)	
Police Officer I. Chavez, Star No. 3278, and)	JURY TRIAL DEMANDED
Chicago Police Officer A.R. Schurman,)	
Star No. 13751,)	
)	
Defendants.)	

**DEFENDANT OFFICERS' AGREED MOTION TO
EXTEND TIME TO ANSWER OR OTHERWISE PLEAD**

Defendants, Ildefonso Chavez and Andrew Schurman, (Defendant Officers) by and through one of their attorneys, Matthew R. Hader, Assistant Corporation Counsel for the City of Chicago, respectfully request this Honorable Court to enlarge the time, up to and including March 4, 2008, in which to answer or otherwise plead to the Complaint. In support of this motion, Defendant states:

1. This matter was filed by the Plaintiff on December 12, 2007.
2. Summons and Complaint were served upon Defendant Chavez on January 12, 2008. Summons and Complaint were served upon Defendant Schurman on January 11, 2008.
3. The undersigned filed an appearance for the Defendant Officers on this day, February 7, 2008.
4. Defendant Officers' Answer or other responsive pleading was due on or about February 1, 2008.
5. The undersigned has not yet been able to review materials pertinent to the allegations in order to be able to file an Answer or other responsive pleading. Nor has the undersigned been able to meet with the defendants to discuss the

Complaint or a responsive pleading.

6. The Defendant Officers request that the time to answer or file a responsive pleading to the Complaint be extended thirty days, up to and including March 4, 2008.
7. This motion is Defendant Officers' first request for an extension of time to answer or otherwise plead. Such a request is not intended to unduly delay the resolution of the disputed issues.
8. On this day, the undersigned spoke with Katie Ehrmin, one of the attorneys representing the plaintiff, who indicated that this motion could be filed as an agreed motion.

WHEREFORE, Defendants, Chavez and Schurman, respectfully request that they be given until March 4, 2008, to answer or otherwise plead to plaintiffs' Complaint.

Respectfully submitted,

s/ Matthew R. Hader
MATTHEW R. HADER
Assistant Corporation Counsel

30 North La Salle Street
Suite 1400
Chicago, Illinois 60602
(312) 742-9586
Atty. No. 06284330

CERTIFICATE OF SERVICE

I, Matthew R. Hader, hereby certify that I have caused a true and correct copy of the above and foregoing **NOTICE OF AGREED MOTION** and **DEFENDANT OFFICERS' AGREED MOTION TO EXTEND TIME TO ANSWER OR OTHERWISE PLEAD**, to be sent to the following person(s) named below via ECF filing on this 7th day of February, 2008.

Jeffrey B. Granich
Law Offices of Jeffrey B. Granich
53 W. Jackson Blvd.
Suite 840
Chicago, IL 606040
(312) 939-9009

s/ Matthew R. Hader
MATTHEW R. HADER
Assistant Corporation Counsel